COMMONWEALTH OF KENTUCKY
BEFORE THE
KENTUCKY PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF	**)**	**CASE NO.**
INTERCONNECTION AND NET METERING	**)**	**2020-00302**
GUIDELINES	**)**	

CUMBERLAND VALLEY ELECTRIC, INC.
VERIFIED RESPONSE TO
COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
ENTERED JUNE 30, 2026

Comes now Cumberland Valley Electric, Inc. ("Cumberland Valley"), by counsel, and does hereby tender its Verified Response to the Commission Staff's First Request for Information entered June 30, 2026.

Dated: July 14, 2026

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF INTERCONNECTION AND NET METERING GUIDELINES	)))	CASE NO. 2020-00302

VERIFICATION OF MARK ABNER

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF KNOX)

Mark Abner, Engineering Manager, being duly sworn, states that he has supervised the preparation of responses to Commission Staff's First Request for Information in the above referenced case and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.

Mark Abner

Mark Abner

The foregoing Verification was signed, acknowledged and sworn to before me this 13th day of July 2026, by Mark Abner.

Barbara Elliott

Commission expiration: 2-13-27

Cumberland Valley Electric, Inc.
Case No. 2020-00302
Commission Staff's First Request for Information

Request 1: Refer to Case No. 2008-00169, Development of Guidelines for Interconnection and Net Metering for Certain Generators with Capacity up to Thirty Kilowatts (Ky. PSC Jan. 8, 2009), Appendix A.

a. Provide red-lined tariff sheets for any updates or changes made to the utility's tariff regarding the interconnection and net-metering guidelines since the implementation of such guidelines in Case No. 2008-00169.

b. Provide any safety or engineering requirements currently required or available to net metering and interconnection customers to help ensure safety and reliability that are not required under the Commission's Interconnection and Net Metering Guidelines.

c. Provide the current percent of cumulative capacity of the utility's single hour peak load during calendar year 2025. Explain how the utility calculated this percentage.

d. Provide the case number where each change or update was approved.

Response 1(a): Please see attached.

Response 1(b): All safety and emerging requirements are contained in the Application for Interconnection. Please see Cumberland Valley's Tariff, Rate Schedule NM – Net Metering, Level 1- Application for Interconnection and Net Metering (unnumbered tariff sheet, pdf page 119).

Response 1(c): Cumberland Valley's current percentage of cumulative capacity of its single hour peak load for 2025 was 0.5472%. This was calculated by taking Cumberland Valley's net metering capacity and dividing by its single hour peak load (which includes its entire load).

Response 1(d): Case No. 2019-00440, *Electronic Amendment of Jurisdictional Electric Utilities' Net Metering Tariffs to Reflect the Increase in Maximum Rated Capacity from 30 Kilowatts to 45 Kilowatts Pursuant to the Net Metering Act*, December 9, 2019 Order (Ky. PSC December 9, 2019).

RATES SCHEDULE NM—NET METERING

AVAILABILITY OF NET METERING SERVICE

Net Metering is available to eligible member-generators in Cumberland Valley Electric's service territory, upon request, and on a first-come, first-served basis up to a cumulative capacity of one percent (1%) of the Cumberland Valley Electric's single hour peak load during the previous year. If the cumulative generating capacity of net metering systems reaches 1% of a supplier's single hour peak load during the previous year, upon Commission approval, Cumberland Valley Electric's obligation to offer net metering to a new member-generator may be limited. An eligible member-generator shall mean a member retail electric member of Cumberland Valley Electric with a generating facility that:

1) Generates electricity using solar energy, wind energy, biomass or biogas energy, or hydro energy;
2) Has a rated capacity of not greater than ~~thirty (30)~~ forty five (45) kilowatts; T
3) Is located on the member's premises;
4) Is owned and operated by the member;
5) Is connected in parallel with Cumberland Valley Electric's electric distribution system; and
6) Has the primary purpose of supplying all or part of the member's own electricity requirements.

At its sole discretion, Cumberland Valley Electric may provide Net Metering to other member- generators not meeting all the conditions listed above on a case-by-case basis.

METERING

Cumberland Valley Electric shall provide net metering services, without any cost to the Member for metering equipment, through a standard kilowatt-hour metering system capable of measuring the flow of electricity in two (2) directions. This provision does not relieve Member of his or her responsibility to pay metering costs embedded in the Cumberland Valley Electric's Commission-

Cumberland Valley Electric, Inc.
Case No. 2020-00302
Commission Staff's First Request for Information

Request 2: Describe how many net-metering and interconnection customers the utility has, including what type of generating facility and energy storage, if applicable, each customer has.

Response 2: Cumberland Valley Electric, Inc. currently has a total of 70 Level 1 accounts and 0 Level 2 accounts. Below is a breakdown of members by generating facility and energy storage type.

	Number of Members		
	Solar (with battery storage)	Solar (without battery storage)	Total
Level 1	8	62	70
Level 2	0	0	0

Cumberland Valley Electric, Inc.
Case No. 2020-00302
Commission Staff's First Request for Information

Request 3: Provide a breakdown of the approximate costs for the utility associated with interconnection for the past five years. In this response, separate the approximate costs associated with level 1 and level 2 applications.

Response 3: Cumberland Valley does not track the cost for interconnection. However, Cumberland Valley has made a high level estimate for purposes of this response. Cumberland Valley looked at the costs associated for equipment, overhead and labor for the net metering applications received and the costs would be somewhere between $200 and $300 per application. If the applicant then interconnects Cumberland Valley would also have lost revenues associated with that interconnection.

Cumberland Valley Electric, Inc.
Case No. 2020-00302
Commission Staff's First Request for Information

Request 4: Provide an overview of how the interconnection application and agreement process works. In this overview, explain approximately how long each step in the process takes, who is responsible for initiating each step of the process, when progress is communicated to the applicant, and what costs are associated with this process for the utility and applicants. Also explain, if a customer does not qualify or is ineligible during the review process, the protocols and considerations for coming to that determination and communicating that decision to the applicant.

Response 4: Please see Cumberland Valley's Tariff, Rate Schedule NM – Net Metering, Level 1- Application for Interconnection and Net Metering (unnumbered tariff sheet, pdf page 119). Also see, Cumberland Valley's Tariff, Rate Schedule NM – Net Metering, Level 2- Application for Interconnection and Net Metering (unnumbered tariff sheet, pdf page 127). The process for potential net-metering interconnection is outlined in Application for Level 1 and Level 2 interconnections.

Cumberland Valley Electric, Inc.
Case No. 2020-00302
Commission Staff's First Request for Information

Request 5: Explain whether the utility recovers in rates any expenses for the interconnection application process. If not, explain why not.

Response 5: No, there is no rate recovery. The interconnections are a non-recurring expense and completed in the ordinary course of business. There are no recoverable expenses associated with interconnection.

Cumberland Valley Electric, Inc.
Case No. 2020-00302
Commission Staff's First Request for Information

Request 6: Explain which IEEE Standard is currently applicable for purposes of interconnection. If IEEE Standard 1547-2018 is not currently applicable, explain the utilities' position for implementing IEEE Standard 1547-2018.

Response 6: In Cumberland Valley's net metering application IEEE Standard 1547 is referenced. It is understood that the current version of the standard is applicable.

Cumberland Valley Electric, Inc.
Case No. 2020-00302
Commission Staff's First Request for Information

Request 7: Explain the interconnection requirements if a customer does not qualify or is ineligible during the review process for a level one application; a level two application; and both levels.

Response 7: If a member does not qualify or is ineligible, the member cannot interconnect.

Cumberland Valley Electric, Inc.
Case No. 2020-00302
Commission Staff's First Request for Information

Request 8: Explain how behind the meter battery energy storage resources are considered under the existing tariff for both net-metering and non-net metering customers.

Response 8: If they are net-metering members, they are considered as all other net-metering members are considered. If a member is a non-net metering member, the Cooperative would have no way to know if the member has battery storage.

Cumberland Valley Electric, Inc.
Case No. 2020-00302
Commission Staff's First Request for Information

Request 9: Explain what safety and technical standards are used to safely and reliably integrate behind-the-meter battery energy storage resources. Explain, if applicable, what changes to software, communications, billing, and utility systems would need to change in order to accommodate third party DER- aggregation. If not applicable, explain why not.

Response 9: The safety and technical standard are the IEEE 1547 standard current version. The Commission's Order in Case No. 2012-00169[1], requires East Kentucky Power Cooperative, Inc. to act as the aggregator for its Member-Owner Cooperatives, and third-party aggregators are not allowed.

[1] *Application of East Kentucky Power Cooperative, Inc. to Transfer Functional Control of Certain Transmission Facilities to PJM Interconnection LLC*, Case No. 2012-00169, December 21, 2012 Order (Ky. PSC December 21, 2012).